

**RECEIVED**

AUG 30 2017

CLERK, U.S. DISTRICT COURT  
ST. PAUL, MINNESOTA

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Plaintiff(s),

vs. Daniel Donahue

Case No. 17cv4061 JNE/HB  
(To be assigned by Clerk of District Court)

DAKOTA County Minnesota County Attorneys  
DAKOTA County Minnesota USA, and,  
The City of Inner Grove Heights, AND DEMAND FOR JURY TRIAL  
FSA, AND INNER GROVE HEIGHTS  
police Department, The League of  
Minnesota Cities. Defendant(s). YES  NO

(Enter the full name(s) of ALL defendants in  
this lawsuit. Please attach additional sheets  
if necessary).

**COMPLAINT**

PARTIES

1. List your name, address and telephone number. Do the same for any additional plaintiffs.

a. Plaintiff Daniel Donahue

Name Daniel Donahue

Street Address 435 University Ave E. #112

County, City Ramsey County Saint Paul

State & Zip Code Minnesota 55100

Telephone Number

SCANNED

AUG 31 2017

U.S. DISTRICT COURT ST. PAUL

2. List all defendants. You should state the full name of the defendant, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant may be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption.

a. Defendant No. 1 DAKOTA COUNTY

Name DAKOTA County, Dakota County DISTRICT ATTORNEY'S OFFICE  
Street Address 1560 Highway 55 STAFF and Employees  
of DAKOTA County MN USA

County, City HASTINGS, MN 55033

State & Zip Code DAKOTA COUNTY

b. Defendant No. 2 CITY OF INVER GROVE HEIGHTS MINNESOTA - AS

Name INVER GROVE HEIGHTS POLICE DEPARTMENT

Street Address 8150 BARBATA AVE. E

County, City INNER GROVE HEIGHTS, MN 55077

State & Zip Code DAKOTA COUNTY

c. Defendant No. 3 League of Minnesota Cities

Name League of Minnesota Cities

Street Address 145 University Ave W, St Paul, MN

County, City RAMSEY, MN Saint Paul

State & Zip Code

NOTE: IF THERE ARE ADDITIONAL PLAINTIFFS OR DEFENDANTS, PLEASE PROVIDE THEIR NAMES AND ADDRESSES ON A SEPARATE SHEET OF PAPER.

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to correspond to the appropriate numbered paragraph above (e.g. Additional Defendants 2.d., 2.e., etc.)

**JURISDICTION**

Federal courts are courts of limited jurisdiction. Generally, two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount of damages is more than \$75,000 is a diversity of citizenship case.

3. What is the basis for federal court jurisdiction? (*check all that apply*)

Federal Question       Diversity of Citizenship

4. If the basis for jurisdiction is Federal Question, which Federal Constitutional, statutory or treaty right is at issue? List all that apply.

5. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party? Each Plaintiff must be diverse from each Defendant for diversity jurisdiction.

Plaintiff Name: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 1: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

Defendant No. 2: \_\_\_\_\_ State of Citizenship: \_\_\_\_\_

**Attach additional sheets of paper as necessary and label this information as paragraph**

**5.**

**Check here if additional sheets of paper are attached.**

6. What is the basis for venue in the District of Minnesota? (*check all that apply*)

Defendant(s) reside in Minnesota  Facts alleged below primarily occurred in Minnesota

Other: explain

*Minnesota agencies involvement(s)*

**STATEMENT OF THE CLAIM**

Describe in the space provided below the basic facts of your claim. The description of facts should include a specific explanation of how, where, and when each of the defendants named in the caption violated the law, and how you were harmed. Each paragraph must be numbered

separately, beginning with number 7. Please write each single set of circumstances in a separately numbered paragraph.

*4<sup>th</sup> Amendment of US Constitution*

7. 1) June 17<sup>th</sup> 2013 ARRESTED FALSELY w/o PROVABLE CAUSE, w/o appropriate warrant, using 3<sup>rd</sup>, perhaps 5<sup>th</sup> party vendor verified information violating plaintiffs 4<sup>th</sup> Amendment, using non reliable marketed criminal history incorrect for plaintiffs Identity, accusing him of a crime computer forensic sciences proved not to be possible, also previously verified to law enforcement that plaintiff was indeed not the <sup>inmate</sup> culprit, by financial institution personnel, Inner Grove Heights Police department personnel continued to, maliciously pursue and convert MR Donohue into suspect #1  
(b) also re detaining MR Donohue after the circuit court judge  
monitored releasing on own Recognizance 6/20/2013 approx 0300 hrs.  
1) Defendants, cooperating in an involuntary Commitment attempt @ regions hospital stating Plaintiff was suicidal homicidal using 2566 Minnesota without cause. Nothing proven, no exculpatory effort on behalf of accused  
also all alleged facts and allegations listed in original  
Complaint.

Attach additional sheets of paper as necessary.

Check here if additional sheets of paper are attached:

Please label the attached sheets of paper to as Additional Facts and continue to number the paragraphs consecutively.

as well as see  
attached

REQUEST FOR RELIEF

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking.

The original complaint asked for 6 million dollars as the next set of deprivations were discovered before the process, discovery and fact finding the through the process, discovery and fact finding the filing of that was denied along with the rest of the due process and further rights protected under constitution deprivations listed here. 10 million US Restraints order against Dakota County. Written apology.

Court.

1) Abuse of process

- Plaintiff (a) used process to deny plaintiff access to evidence, b) then used process to blame and penalize, sanction, plaintiff, deprived him of the court process.

2) Depriving plaintiff

1) Right to a trial US constitution

2) Right to remedy for wrongs - MN Const.

3) Right to justice - MN Const.

4) Right to feel secure and safe 4<sup>th</sup> amendment

5) 14<sup>th</sup> amendment - due process (fair, complete)

6) 5<sup>th</sup> amendment - deprived of life liberty without due process.

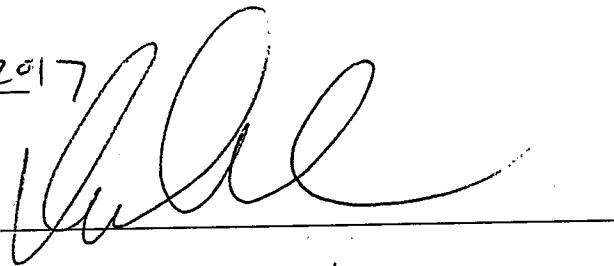
7) 6<sup>th</sup> amendment - never got to confront witnesses or provide witnesses, evidence in my favor

~~and~~ and any other addendum(s) to be submitted  
once dissolved.

Signed this 30<sup>th</sup>

day of August 2017

Signature of Plaintiff



Mailing Address 435 University Ave #112  
St Paul, MN 55130

Telephone Number NO

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint and provide his/her mailing address and telephone number. Attach additional sheets of paper as necessary.